

From: [John Hebert](#)  
To: [Meredith Laws](#)  
Cc: [Russell Wasem](#); [Jennifer Gaines](#)  
Subject: Re: Fw: Fwd: Risk Mitigation Info  
Date: 05/17/2011 12:54 PM  
Attachments: [RiskMitigationInfo0001.pdf](#)

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Hey Meredith - I quickly looked over all the materials. I think they are mostly accurate with just a few comments:

1. In the Joe Teague (from Univar) piece, second bullet under "Retail (Homeowner Uses)" we are allowing more bait forms than just blocks for consumers. We will also allow gels and other solid forms that rodents cannot easily move from the station to somewhere else. But mostly I think we're talking about blocks and gels here.

2. The Bell information looks OK.

On the second email attachment ("RMD Summary Effective June 4, 2011" - not clear to me who wrote this), my comments:

3. On the consumer part - We are not requiring bait stations to be pre-loaded. The only requirement is that bait must be sold with the station. It does not have to be "pre-loaded" in the station. Another thing to add to this section is that outdoor, above ground placements must be in a Tier 1 station.

4. For the Ag section.....We are not restricting where 2nd gen anti-coagulants can be used. They can be used indoors and bait stations are required if non-targets/children may have access to them.

5. If they will have a list (pg. 2) of the AIs and trade names, they should also include a list of the non anticoagulants. They make reference to these in the consumer section. Also, difenacoum is missing from the 2nd generation list.

One thing missing from both pieces is any discussion (unless I missed it) of the Tiered consumer bait stations. I'm copying Jen and Rusty on this to see if they have any additional comments. Hope you're having fun in Seattle.

john

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John Hebert, Acting Chief  
RIMUERB  
Registration Division  
Office of Pesticide Programs  
703-308-6249

▼ [Meredith Laws---05/16/2011 06:39:37 PM---John - Robin from WA state told me about this, take a look at it and let me know what you think. Pl](#)

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From: Meredith Laws/DC/USEPA/US  
To: John Hebert/DC/USEPA/US  
Date: 05/16/2011 06:39 PM  
Subject: Fw: Fwd: Risk Mitigation Info

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John - Robin from WA state told me about this, take a look at it and let me know what you think. Please also share with Jen, Rusty, etc. Thx

to -----\Sent by EPA Wireless E-Mail Services.

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**From:** "Schoen-Nessa, Robin (AGR)" [RSchoen-Nessa@agr.wa.gov]  
**Sent:** 05/16/2011 03:19 PM MST  
**To:** Meredith Laws  
**Subject:** Fw: Fwd: Risk Mitigation Info

1st of two emails related to distributor info given to rodenicide dealer

From : bestpest2008@comcast.net [mailto:bestpest2008@comcast.net]  
Sent: Friday, May 13, 2011 09:54 AM  
To: Schoen-Nessa, Robin (AGR)  
Subject: Fwd: Risk Mitigation Info

Mike Cramer asked me to forward this information to you regarding upcoming changes - we received this from our pesticide distributor today.

Sincerely,

Kristina (Tina) Mergens, Office Manager  
Patricia (Patty) Lord, Office Assistant  
Best Pest Control & Absolute Mole Control  
425-743-4010 or 877-633-6928 & 800-616-6537

----- Forwarded Message -----

From: "Joe Teague" <Joe.Teague@univarusa.com>  
To: ablepest@integraonline.com, "Adam/United" <adamp@unitedpestsolutions.com>, "Al Brown" <al.brown@cascadepest.com>, "Alex Altizer (alexaltizer@verizon.net)" <alexaltizer@verizon.net>, "Art Bader Jr." <art.bader@comcast.net>, "TIM BAKER (Budrodent@aol.com)" <Budrodent@aol.com>, "Ben Danielson" <operations@edenpest.com>, "Bill Petersen (bpetersen@seattlehousing.org)" <bpetersen@seattlehousing.org>, "Brad Onstot" <brad.onstot@pointepestcontrol.com>, "Burt Holmes" <burtepestcontrol@gmail.com>, "Corey Chantry (cchantry@comcast.net)" <cchantry@comcast.net>, "Cindy Gutzwiler (pestproblems@yahoo.com)" <pestproblems@yahoo.com>, cpearsall@senske.com, "Russ Craber (russ@sunpest.com)" <russ@sunpest.com>, "Brad Cyrier (bugmans@comcast.net)" <bugmans@comcast.net>, "DAMON MARTIN (actionpest@earthlink.net)" <actionpest@earthlink.net>, "Dan Nyssen (valleypest@yahoo.com)" <valleypest@yahoo.com>, dlong@longpestcontrol.com, "Don Thompson" <dthompson@independentpestsolutions.com>, "eagle pest" <eagle\_pest@comcast.net>, "Gary Clark" <gary@pestfree.net>, gchafe@senske.com, "George Sykora (bugoffpe1@msn.com)" <bugoffpe1@msn.com>, "Heather Zeorlin" <heather@cascadepest.com>, "Erik Hodson (ehodson@whitworthpestsolutions.com)" <ehodson@whitworthpestsolutions.com>, "Jack Plankenhorn" <jack@eastsideexterminators.com>, "Jeff Miller" <jmiller@spraguepest.com>, "Jeff Weier" <jweier@spraguepest.com>, "Jerry Hogard (bjhogard@hotmail.com)" <bjhogard@hotmail.com>, "Jim Lovelace" <jim@completepest.com>, "Jim Stiles" <jim@edenpest.com>, "Jo An" <Jo.An@univarusa.com>,

joe@aardpestcontrol.com, "Joel Weller" <joel@sunrisepest.com>, "John Kumpula (kumpula46@msn.com)" <kumpula46@msn.com>, "Kevin Peterson" <kevin@stopbuggingmenow.com>, "Kyle Ogiela" <ogiela@greenpestservices.net>, "Jack Marlowe (jackmarlowe@edenpest.com)" <jackmarlowe@edenpest.com>, "Marty Huff (mrhuff01@hotmail.com)" <mrhuff01@hotmail.com>, "Mary Marshall" <mary@eastsideexterminators.com>, "Mike Cramer (bestpest2008@comcast.net)" <bestpest2008@comcast.net>, "Mike Willis (wapest@qwestoffice.net)" <wapest@qwestoffice.net>, mountainmistfarm@hotmail.com, "Patricia Fiegenger" <Patricia.Fiegenger@univarusa.com>, "Ray Williamson" <raywilliamson@comcast.net>, "Rick Mix (rick@willardspestcontrol.com)" <rick@willardspestcontrol.com>, "RON LAKE (alderwoodpestcontrol@msn.com)" <alderwoodpestcontrol@msn.com>, "Aaron Rooney (adrooney@comcast.net)" <adrooney@comcast.net>, rwarner@spraguepest.com, rwilliamson@paratex.com, "SEAN BERGMAN (seanb@unitedpestsolutions.com)" <seanb@unitedpestsolutions.com>, "Stan Dawkins (stan@edenpest.com)" <stan@edenpest.com>, "Steve Billmyer (billmyers@rockisland.com)" <billmyers@rockisland.com>, "Steve Cornwell (steve@biobug.com)" <steve@biobug.com>, "Steve Lindsey" <ohwi@yahoo.com>, "Steve McCready" <steve@eastsideexterminators.com>, "Steve Smith (pricepest@hotmail.com)" <pricepest@hotmail.com>, "Tim Gallagher (tgallagher@spraguepest.com)" <tgallagher@spraguepest.com>, "Ross Treleven (rtreleven@spraguepest.com)" <rtreleven@spraguepest.com>, "WAYNE Boudreau (pestwork@aol.com)" <pestwork@aol.com>, wpctwbug@aol.com  
Sent: Friday, May 13, 2011 9:15:32 AM  
Subject: FW: Risk Mitigation Info

This is the latest info I have on the upcoming Rodenticide Mitigation Issue.

**Joe Teague**  
Outside Sales Representative  
**Univar**  
T +1 206 390 6348

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From: Jo An  
Sent: Friday, May 13, 2011 9:03 AM  
To: Joe Teague  
Subject: Risk Mitigation Info

Here you go...

Best regards,